

This proposed rule appears to criminalize a broad class of useful equipment and software, apparently for the sole benefit of a small group of "content producers". This would be harmful to the public, as they would no longer be able to purchase such equipment and software. Developers of innovative software to help manage multimedia streams would be forbidden to distribute their work without seeking government approval in detail.

This is the wrong direction to take in protecting copyright owners' rights, as it also criminalizes the means to exercise citizens' fair use rights. It places control over technical innovation in the hands of those most threatened by innovation. It threatens a source of innovation that generates hundreds of billions of dollars in value per year, all over the nation.